

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

GINA CRISCIONE, et al., <i>Plaintiffs,</i> v. LAURA DiVINCENZO, et al., <i>Defendants.</i>	Case No.: 1:24-cv-01446-PAB Judge Pamela A. Barker Magistrate Judge James E. Grimes Jr.
GINA CRISCIONE AND ESTATE OF DOROTHY MANDANICI'S MOTION FOR EXTENSION OF TIME TO OPPOSE DEFENDANTS' MOTION FOR A PROTECTIVE ORDER	

Plaintiffs Gina Criscione and Estate of Dorothy Mandanici respectfully move for a 14-day extension of time to oppose Defendants' motion for a protective order staying discovery, which is currently due July 17.

Defendants' motion proposes incorporating discovery from the parties' previous litigation in state court as either a substitute for or supplement to any discovery in this case. Based on that motion, Ms. Criscione reached out to Defendants on July 9 to discuss the desired terms of such an order to determine whether the parties can simply resolve the matter through stipulation.

As of this filing, Ms. Criscione is still awaiting proposed language from Defendants. She therefore requests an additional 14 days—until July 31—for the parties to determine whether and to what extent any opposition to Defendants' motion remains necessary.

Respectfully submitted,

/s/Brian D. Bardwell

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CERTIFICATE OF SERVICE

I certify that on July 15, 2025, this document was served on opposing counsel as provided by Fed. R. Civ. P. 5(b)(1).

/s/Brian D. Bardwell

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